## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION CASE NO. 5:21-CV-225-BO

JUDITH KNECHTGES,	)
Plaintiff, v.  N.C. DEPARTMENT OF PUBLIC SAFETY, ERIC HOOKS, JANET THOMAS, and TERRI CATLETT,  Defendants,	CONSENT MOTION TO AMEND SCHEDULING ORDER AND EXTEND TIME FOR COMPLETING DISCOVERY AND FILING DISPOSITIVE MOTIONS  DISPOSITIVE MOTIONS

NOW COMES the undersigned and moves the court pursuant to Fed. R. Civ. P. 6(b)(1)(B) and Local Civil Rule 6.1, and with the consent of opposing counsel, to enter an order extending the time for discovery to take place and for the filing of dispositive motions. In support of this motion, the undersigned shows the Court the following:

- 1. This motion is not interposed for the purposes of delay.
- 2. Counsel for the Plaintiff has been transitioning to a new law firm with the understandable complications of lacking support staff and office infrastructure.
- 3. Counsel for the Defendants has been transitioning from work out of an office due to the pandemic to work in an office with the understandable

complications of lacking support staff and office infrastructure.

4. Counsel for the Plaintiff and Defendants believe that they can conclude

the discovery necessary to be able to file dispositive motions with an

additional sixty (60) days.

Therefore, on behalf of both parties, the undersigned respectfully requests that

the Court amend the Scheduling Order (DE 11) to allow the parties up to and

including Monday, May 30, 2022, to conclude discovery and until Monday, June 27,

2022, to file dispositive motions.

Respectfully submitted, this the 8th day of March 2022.

/S/ VALERIE BATEMAN

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing MOTION TO EXTEND DISCOVERY PERIOD AND TIME FOR FILING DISPOSITIVE MOTIONS was served by filing the document electronically via the CM/ECF system, which will send notification of such filing to all counsel of record This the 8th day of March 2022.

> /S/ VALERIE BATEMAN NEW SOUTH LAW FIRM